

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
MARGARET W. LAMBROSE  
3 Assistant Federal Public Defender  
Nevada State Bar No. 11626  
4 411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
5 (702) 388-6577/Phone  
(702) 388-6261/Fax  
6 Maggie\_Lambrose@fd.org

7 Attorney for Gregory Cooper

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 GREGORY COOPER,  
15 Defendant.

Case No. 2:18-cr-00364-JCM-VCF

**STIPULATION TO CONTINUE**  
**MOTION DEADLINES**  
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
18 Trutanich, United States Attorney, and Kevin D. Schiff, Assistant United States Attorney,  
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,  
20 and Margaret W. Lambrose, Assistant Federal Public Defender, counsel for Gregory Cooper,  
21 that the parties herein shall have to and including April 17, 2019, to file any and all pretrial  
22 motions and notices of defense.

23 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
24 shall have to and including May 1, 2019, to file any and all responsive pleadings.

25 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
26 shall have to and including May 8, 2019, to file any and all replies to dispositive motions.

1 The Stipulation is entered into for the following reasons:

2 1. Counsel for defense needs additional time to review the discovery and consult  
3 with her client to determine whether pretrial motions will be filed in this case.

4 2. The defendant is incarcerated and does not object to the continuance.

5 3. The parties agree to the continuance.

6 4. The additional time requested herein is not sought for purposes of delay, but  
7 merely to allow counsel for defendant sufficient time within which to be able to effectively and  
8 complete investigation of the discovery materials provided.

9 This is the second stipulation to continue motion deadlines filed herein.

10 DATED this 27th day of March, 2019.

11 RENE L. VALLADARES  
12 Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

13 */s/ Margaret W. Lambrose*  
14 By \_\_\_\_\_

*/s/ Kevin D. Schiff*  
By \_\_\_\_\_

15 MARGARET W. LAMBROSE  
Assistant Federal Public Defender

KEVIN D. SCHIFF  
Assistant United States Attorney

## DISTRICT OF NEVADA

Defendant.

ORDER

James C. Mahan  
UNITED STATES DISTRICT JUDGE